



association of new jersey
environmental commissions

June 1, 1979

Richard A. Baker, Chief
Permits Administration Branch
Planning & Management Branch
EPA, Region II
26 Federal Plaza
New York, N.Y. 10007

NPDES PERMIT RENEWAL
APPLICATION

Dear Dr. Baker:

I have reviewed the renewal permit for L.E. Carpenter Corporation, permit N.J. 0003611, and have the following comments.

The permit names only three discharge points, yet the plant has numerous pipes leading from the building. These additional pipes without permits, should be permanently closed off, or removed. This would reduce the possibility of the so-called "accidental" discharge.

On page I-3 there is a category for "surface impoundment with no effluent." The firm does indeed have a surface impoundment on site, that would seem to warrant some further investigation. Also, since they have a scavenger for removal of chemical wastes, it would seem that the permit would make some note as to the number of gallons used, and subsequently removed.

For discharge points 001 and 002, there is no figure for the maximum flow period. This could be very important, especially during periods of low flow in the river, and with regard to when the monitoring of the discharge occurs.

A more thorough description of the "printing operation" and of the "coating operation" should be included. Included should be a listing of toxic and deliterious substances, which if mixed with the cooling water, could be accidentally discharged into the waterway. The raw materials used in both processes should also be listed.

I question whether the discharges have ever been properly analyzed for the listed contaminants. EPA should conduct a thorough analysis before this permit is renewed. This area is of particular concern in light of EPA's recent request of L.E. Carpenter to monitor for oil and grease in discharges supposedly free of contaminants.

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The allowable temperature ranges for both 001 and 002 are high. According to the N.J. Surface Water Quality Standards, "no heat may be added which would cause temperatures to exceed 2 degrees Fahrenheit over ambient at any time or which would cause temperatures in excess of 68 degrees Fahrenheit." Since the discharge is 20° F higher than the untreated intake water during the winter, and at times 25° F higher during summer months, I believe the ambient water temperatures are being raised at least 2° F, in violation of the N.J. Standards.

For discharge point 003, the maximum flow period should be stated. L.E. Carpenter reports having certain constituents present in their discharge number 003, which could have an effect on the COD and/or BOD of the waterway. The firm should be required to monitor for either the COD or BOD.

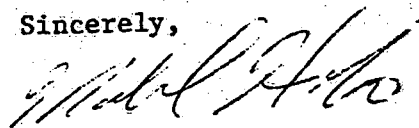
Temperature levels for 003 are tremendously high, and again, would quite possibly violate the N.J. Surface Water Quality Standards. The pH also exceeds the allowable level set by the State of N.J. Both the temperature and the pH should be adjusted to meet the standards set by the State.

The final page of the permit lists five chemicals used in the boiler treatment process. The permit should make more than a casual mention of these, and include some monitoring requirements. Again, I don't believe EPA has adequately documented the actual discharge constituents.

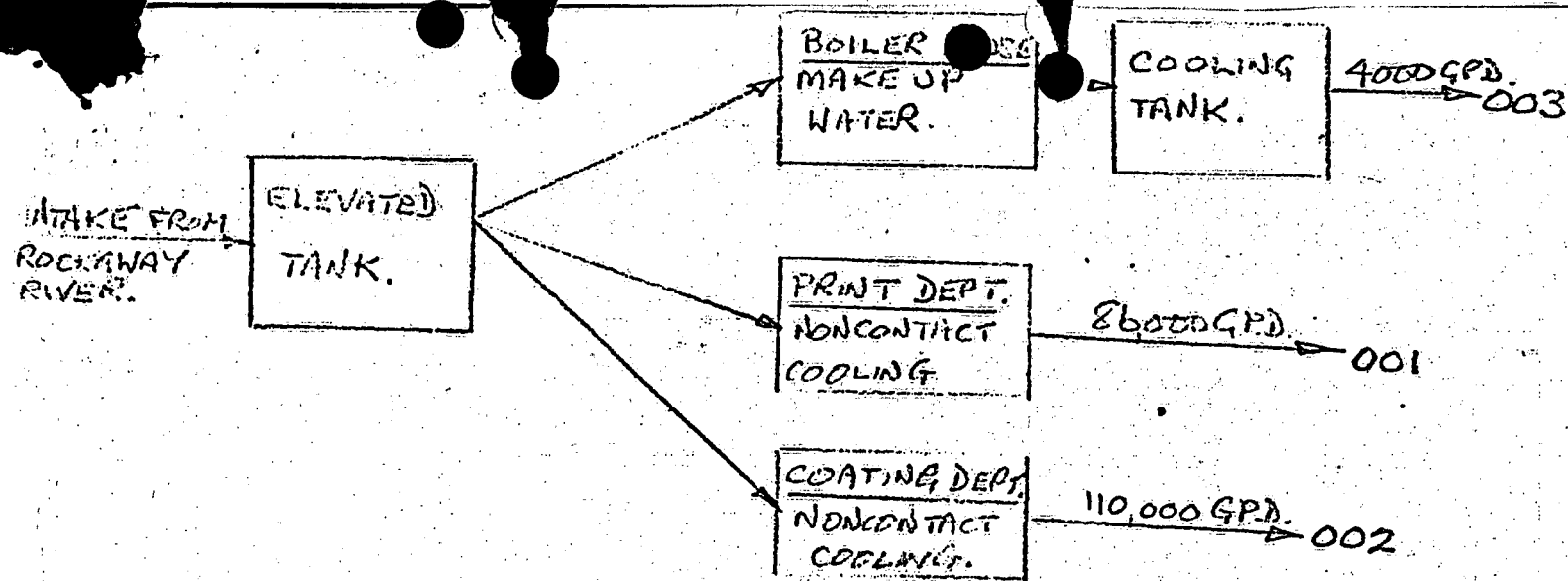
Since the L.E. Carpenter discharge could quite possibly have a detrimental impact upon the quality of the waterway, the monitoring frequency should be increased to a minimum of once per month. L.E. Carpenter is currently being investigated with regard to pollution of both surface and ground water with toxic chemicals. A more frequent monitoring schedule, and a more thorough investigation of the site would seem to be warranted.

I would appreciate some reply as to the action to be taken by EPA. Thank you for your cooperation.

Sincerely,



Michael Havrisko
Water Resource Team



SCHEMATIC OF WATER FLOW.

